

# KOBRE & KIM

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September 27, 2022

Honorable Nicholas G. Garaufis  
United States District Judge  
United States Courthouse  
Brooklyn, New York 11201

**Re:     *United States v. Allison Mack,***  
**S2 18 Cr. 204 (NGG)**

Dear Judge Garaufis:

We write respectfully on behalf of our client, Allison Mack (“Ms. Mack”), who was sentenced by this Court on July 27, 2021, to request that the Court exonerate her bond and order the release of property posted to secure that bond. We also request that the Court order the release of Ms. Mack’s passport.

On April 24, 2018, Ms. Mack was released on a \$5 million bond executed by Ms. Mack and secured by collateral including (1) the mortgages for two properties with a combined estimated market value of approximately \$1,730,000; (2) Lien on an individual retirement account owned by the defendant in the amount of \$585,000. *See* ECF Dkt. No. 24. Given that the case is now resolved, we respectfully request that Your Honor sign the attached proposed order, which (1) exonerates Ms. Mack’s bond, (2) orders that all property posted as security on the bond be released from liability, and (3) orders Pretrial Services to return Ms. Mack’s passport. Counsel has spoken with Assistant United States Attorney Tanya Hajjar, and the government has no objections to these requests.

We appreciate the Court’s consideration and, as always, are available to answer any questions the Court may have.

Respectfully yours,

/s/ William F. McGovern  
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